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August 31, 2021

VIA ECF

Hon. Vernon S. Broderick
United States District Judge
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

**APPLICATION GRANTED
SO ORDERED** 
VERNON S. BRODERICK
U.S.D.J. 9/1/2021

Re: Farah et al. v. Emirates et ano.
Case No. 1:21-cv-05786 (VSB)

Dear Judge Broderick:

We represent Defendant Emirates ("Defendant") in the above-referenced matter. We write to respectfully request a one (1) week extension of the parties' deadline to submit their joint filing addressing whether "Emirates Severance Plan" is a proper party and why "Emirates Severance Plan" was served twice as per Your Honor's August 30, 2021 Order (ECF No. 28). Defendant also requests a 1-week extension to serve its responsive pleading from September 13, 2021 September 20, 2021. Counsel for Plaintiffs consent to the extension of the submission of the joint status report and the responsive pleading date.

Pursuant to Your Honor's Individual Rules & Practices, Section 1 (G): (1) the original due date for the parties' joint filing is September 3, 2021; (2-3) there have been no previous requests for adjournment or extension; (4) this adjournment request is a joint submission by the parties; and (5) the parties respectfully request a one (1) week extension of the September 3, 2021 joint filing deadline because one of Defendant's lead counsel, Rene E. Thorne, Esq., works and resides in New Orleans, Louisiana. Hurricane Ida has left most of the city and surrounding areas without power and without reliable Wi-Fi. The parties believe a one-week extension will provide sufficient time to confer and prepare a thorough report to the Court. Based on the foregoing, the parties respectfully request the Court grant a one (1) week extension of time to submit their joint filing, up to and including September 10, 2021.

Additionally, per Your Honor's August 30, 2021 Order (ECF No. 28), the parties respectfully refer the Court to the Waiver of the Service of Summons executed by counsel for Defendant and filed with the Court on August 30, 2021 (ECF No. 29). Pursuant to the Waiver, the parties confirm that Defendant has agreed to waive service of a summons in this action and is in receipt of Plaintiffs' Complaint. Defendant also requests a brief adjournment of the time to answer or otherwise respond to the Complaint from September 13, 2021 (ECF No. 29) to September 20, 2021 for reasons similar to the joint report request. Counsel for Plaintiff consents to this extension as well.

Thank you for your attention to this matter.

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Respectfully submitted,

JACKSON LEWIS P.C.

/s/ John J. Porta
John J. Porta

cc: All parties (via ECF)

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